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 23 ROBERT PETREE

24 **UNITED STATES DISTRICT COURT**
 25 **EASTERN DISTRICT OF CALIFORNIA**
 26 **SACRAMENTO DIVISION**

27 ARTHUR J. GALLAGHER & CO.,

28 Plaintiff,

vs.

ROBERT PETREE, HUB INTERNATIONAL
 INSURANCE SERVICES, INC. and DOES 1-
 25, inclusive,

Defendants.

Case No. 2:18-cv-03274-JAM-KJN

**STIPULATION TO EXTEND THE
 DEADLINE TO FILE DISPOSITIONAL
 DOCUMENTS; ORDER**

FAC: February 6, 2020

TRIAL DATE: September 26, 2022

1 Pursuant to Civil Local Rules 143(a)(1) and 144(a), Plaintiff ARTHUR J. GALLAGHER
2 & CO. ("Plaintiff"), and Defendants ROBERT PETREE and HUB INTERNATIONAL
3 INSURANCE SERVICES, INC. (collectively, "Defendants"), by and through their respective
4 counsel of record, hereby stipulate as follows:

5 WHEREAS, Plaintiff filed its First Amended Complaint ("Complaint") on February 6,
6 2020;

7 WHEREAS, the Parties have reached a settlement and filed a Notice of Settlement on
8 August 26, 2022 (ECF No. 120);

9 WHEREAS, on August 26, 2022, this Court ordered the Parties to file dispositional
10 documents within twenty-one (21) days of the Notice of Settlement in accordance with the
11 provisions of Local Rule 160;

12 WHEREAS, the Parties require additional time to finalize the terms of the settlement
13 agreement;

14 WHEREAS, Local Rule 160(b) provides that the Court may, on good cause shown, extend
15 the deadline for filing dispositional papers.

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1 NOW, THEREFORE, the Parties hereby stipulate and request the Court to extend the
2 deadline for the Parties to file dispositional documents by 45 days from September 16, 2022 to
3 October 31, 2022. Good cause exists to extend the deadline for filing the dispositional papers to
4 allow the Parties additional time to finalize their settlement agreement to resolve this action.

5 **IT IS SO STIPULATED.**

6 Dated: September 15, 2022

DE LA PEÑA & HOLIDAY, LLP

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/s/ Thomas J. O'Brien

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GREGORY R. DE LA PEÑA
THOMAS J. O'BRIEN

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Attorneys for Defendants
ROBERT PETREE and HUB

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INTERNATIONAL INSURANCE
SERVICES, INC.

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Dated: September 15, 2022

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

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/s/ Daniel E. Richardson

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ANTHONY J. DE CRISTOFORO
DANIEL E. RICHARDSON

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Attorneys for Plaintiff
ARTHUR J. GALLAGHER & CO.

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20 **ATTESTATION**

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Concurrence in the filing of this document has been obtained from each of the individuals
22 whose electronic signature is attributed above.

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DATED: September 15, 2022

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

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By: /s/ Daniel E. Richardson

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Anthony J. DeCristoforo
Daniel E. Richardson

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Attorneys for Plaintiff
ARTHUR J. GALLAGHER & CO.

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ORDER

Based on the stipulation of the parties, and good cause appearing therefore, the Court hereby orders the deadline for the Parties to file documents disposing of this action be extended by 45 days to October 31, 2022

IT IS SO ORDERED.

DATED: September 15, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE